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**From:** Henry, Tala [Henry.Tala@epa.gov]  
**Sent:** 1/28/2021 7:37:34 PM  
**To:** Nguyen, Thuy [Nguyen.Thuy@epa.gov]  
**CC:** Goodis, Michael [Goodis.Michael@epa.gov]; Keigwin, Richard [Keigwin.Richard@epa.gov]; Messina, Edward [Messina.Edward@epa.gov]; Qian, Yaorong [qian.yaorong@epa.gov]; Nesci, Kimberly [Nesci.Kimberly@epa.gov]  
**Subject:** RE: EPA Preliminary PFAS Results

Hi Thuy -Thanks for considering my input.

Most recently, OPPT defined “long chain PFAS” in a Significant New Use rule promulgated in June 2020 as below (I included all the detailed chemistry stuff b/c I know you can appreciate it 😊), but in a nutshell, the “cut-off” between short- and long-chain is at C4-C5 chain length, C5 and above are long chain, C4 and below are short chain.

§ 721.10536 Long-chain perfluoroalkyl carboxylate chemical substances.

(a) Definitions. The definitions in § 721.3 apply to this section. In addition, the following definition applies:  
[...]

(b) Chemical substances and significant new uses subject to reporting. (1) The chemical substances identified in this paragraph, where  $5 < n < 21$  or  $6 < m < 21$ , are subject to reporting under this section for the significant new uses described in paragraph (b)(4)(i) and (b)(4)(iv) of this section.

(i)  $\text{CF}_3(\text{CF}_2)_n\text{-COO M}$  where  $\text{M} = \text{H}^+$  or any other group where a formal dissociation can be made;

(ii)  $\text{CF}_3(\text{CF}_2)_n\text{-CH=CH}_2$ ;

(iii)  $\text{CF}_3(\text{CF}_2)_n\text{-C(=O)-X}$ , where X is any chemical moiety;

(iv)  $\text{CF}_3(\text{CF}_2)_m\text{-CH}_2\text{-X}$ , where X is any chemical moiety; and

(v)  $\text{CF}_3(\text{CF}_2)_m\text{-Y-X}$ , where Y = non-S, non-N heteroatom and where X is any chemical moiety.

Tala R. Henry, Ph.D.  
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**From:** Nguyen, Thuy <Nguyen.Thuy@epa.gov>  
**Sent:** Thursday, January 28, 2021 1:19 PM  
**To:** Henry, Tala <Henry.Tala@epa.gov>  
**Cc:** Goodis, Michael <Goodis.Michael@epa.gov>; Keigwin, Richard <Keigwin.Richard@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Qian, Yaorong <qian.yaorong@epa.gov>; Nesci, Kimberly <Nesci.Kimberly@epa.gov>  
**Subject:** RE: EPA Preliminary PFAS Results

Good afternoon Tala

## Ex. 5 Deliberative Process (DP)

# Ex. 5 Deliberative Process (DP)

Thanks

Thuy

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**From:** Nesci, Kimberly <[Nesci.Kimberly@epa.gov](mailto:Nesci.Kimberly@epa.gov)>

**Sent:** Thursday, January 28, 2021 11:55 AM

**To:** Henry, Tala <[Henry.Tala@epa.gov](mailto:Henry.Tala@epa.gov)>; Nguyen, Thuy <[Nguyen.Thuy@epa.gov](mailto:Nguyen.Thuy@epa.gov)>; Qian, Yaorong <[qian.yaorong@epa.gov](mailto:qian.yaorong@epa.gov)>

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**Subject:** RE: EPA Preliminary PFAS Results

Looping in Thuy and Yaorong on the question about concentrations below, as well as the suggested edit to the order. We can absolutely do that.

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**From:** Henry, Tala <[Henry.Tala@epa.gov](mailto:Henry.Tala@epa.gov)>

**Sent:** Thursday, January 28, 2021 11:51 AM

**To:** Nesci, Kimberly <[Nesci.Kimberly@epa.gov](mailto:Nesci.Kimberly@epa.gov)>

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**Subject:** RE: EPA Preliminary PFAS Results

As we prepare for potential release, I suggest the PFAS "order" be presented differently ...usually people think about PFAS according to chain lengths, esp distinction between "short-chain" and "long-chain" and the 'anchor' chemicals (analogues) fall into these bins as well (and we will more than likely have to 'read-across' to get anywhere with understanding relative hazard or risk).

So one suggestion would be in order of ascending chain length with a perpendicular bar at the short-long cut off?

Tala R. Henry, Ph.D.

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**From:** Henry, Tala

**Sent:** Thursday, January 28, 2021 11:45 AM

**To:** Nesci, Kimberly <[Nesci.Kimberly@epa.gov](mailto:Nesci.Kimberly@epa.gov)>

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**Subject:** RE: EPA Preliminary PFAS Results

The concentration data seems to have changed a lot from previous reports...was there a concentration conversion made that changed it?

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**From:** Nesci, Kimberly <[Nesci.Kimberly@epa.gov](mailto:Nesci.Kimberly@epa.gov)>

**Sent:** Thursday, January 28, 2021 11:41 AM

**To:** Freedhoff, Michal <[Freedhoff.Michal@epa.gov](mailto:Freedhoff.Michal@epa.gov)>

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**Subject:** FW: EPA Preliminary PFAS Results

Dear Michal,

Thank you for your time this morning. As a follow-up to the briefing, please see attached for the most-current version of our draft data report. This addresses some of your questions on which PFAS species were present and at what amounts. We will also update the briefing paper to include this information, as requested.

Thank you, and please let us know if you have any questions.

Best,  
Kimberly

Kimberly Nesci, Director  
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**From:** Nguyen, Thuy <[Nguyen.Thuy@epa.gov](mailto:Nguyen.Thuy@epa.gov)>

**Sent:** Thursday, January 28, 2021 10:01 AM

**To:** South, Paul <[paul.south@fda.hhs.gov](mailto:paul.south@fda.hhs.gov)>; Honigfort, Paul <[Paul.Honigfort@fda.hhs.gov](mailto:Paul.Honigfort@fda.hhs.gov)>; Koh-Fallet, Sharon <[Sharon.Koh-Fallet@fda.hhs.gov](mailto:Sharon.Koh-Fallet@fda.hhs.gov)>

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**Subject:** EPA Preliminary PFAS Results

Good morning

Attached please find the preliminary results of EPA testing of the fluorinated HDPE containers and the product of concern.

Let us know if you have questions

Thuy